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From: Washburn, Ben

Sent: Mon 12/14/2015 7:38:19 PM

Subject: Need a response for WSJ media inquiry

Team,

John Emshwiller followed-up today regarding BMAC with these questions:

Reading through the BMAC reports you sent links for, I notice that the final pre-CERCLIS report chose to cite (on page 9, Table 4) a remediation level in the soil for Lead-210 of 33.5pCi/g, which it said was the PRG for a 1 in 10,000 additional risk level. Some questions related to these numbers:

- 1. Why did the EPA choose the 1-in-10,000 risk range when, as I understand it, the agency's own guidelines (and perhaps federal law) requires getting as close as can be reasonably done to get down to a 1 in a million additional risk. Using a 1-in-a-million risk standard, wouldn't some of the Lead-210 readings at the BMAC exceed the PRG? If so, wouldn't that suggest remediation is needed?
- 2. In the clean-up of the federal complex at Fernald, Ohio, the EPA's Record of Decision (a copy of which is attached) set the offsite remediation level for Lead-210 in the soil at 2.2 pCi/g. (See Table 9-3). It would appear from the BMAC report that the EPA isn't using that remediation level related to West Lake or contamination generally in the St. Louis area. If the agency isn't using that level, why not?

We also owe him a response regarding Lead-210 sampling that has occurred on-site and those results:

In connection with a story I am working on, I'd like to know if the EPA has done any sampling for Lead-210 at or in the vicinity of the West Lake landfill. If sampling has been done, what were the results? If sampling hasn't been done, why not?

Among other things, I have been reading a 1993 DOE report concerning contamination in the St. Louis area from the nuclear-weapons-related waste produced by the work at Mallinckrodt. A paragraph from that report is below. It indicates that the biggest health risk from the Mallinckrodt nuclear waste came from Lead-210.

You can see that we've issued a first response for the off-site regarding BMAC, but still owe him for the on-site stuff. After today I won't be able to shepherd this media inquiry as I'm effectively out of the office for travel, training, and then leave until January.

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